

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TQ DELTA, LLC, v.	Plaintiff,	Civil Action No. 13-cv-1835-RGA
2WIRE, INC.	Defendant.	
TQ DELTA, LLC, v.	Plaintiff,	Civil Action No. 13-cv-1836-RGA
ZHONE TECHNOLOGIES, INC.	Defendant.	
TQ DELTA, LLC, v.	Plaintiff,	Civil Action No. 13-cv-2013-RGA
ZYXEL COMMUNICATIONS, INC. and ZYXEL COMMUNICATIONS CORPORATION,	Defendants.	
TQ DELTA, LLC, v.	Plaintiff,	Civil Action No. 14-cv-954-RGA
ADTRAN, INC.	Defendant.	
ADTRAN, INC, v.	Plaintiff,	Civil Action No. 15-cv-121-RGA
TQ DELTA, LLC.	Defendant.	

FAMILY 1 PATENTS JOINT CLAIM CONSTRUCTION CHART

Pursuant to ¶ 9 of the Court's Third and Final Scheduling Order, dated April 10, 2017, Plaintiff TQ Delta, LLC and Defendants in the above-captioned cases submit their Joint Claim Construction Chart ("Chart") for the Family 1 Patents (U.S. Patent Nos. 7,835,430 ("the '430 patent"), 7,889,784 ("the '784 patent"), 8,238,412 ("the '412 patent"), 7,570,686 ("the '686

patent”), and 8,432,956 (“the ’956 patent”)). The Chart attached as Exhibit A includes the parties’ respective proposed constructions of the disputed language of the asserted claims of the Family 1 Patents. The Chart includes citations to the parties’ intrinsic evidence in support of such constructions. For the Court’s reference, also included in Exhibit A are the parties’ agreed to constructions for language of the asserted claims. The parties reserve their rights to amend and/or supplement their disclosures.

In addition to the Joint Claim Construction Chart attached as Exhibit A, copies of the Family 1 Patents and additional portions of the intrinsic record are attached as Exhibits B – H:

Exhibit	Description
B	’686 patent
C	’430 patent
D	’784 patent
E	’412 patent
F	’956 patent
G	U.S. Provisional Patent Application No. 60/224,308
H	Excerpts from the prosecution history of the ’686 patent

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